

**Cause No. PD-1359-17  
COURT OF CRIMINAL APPEALS  
OF TEXAS**

FILED  
COURT OF CRIMINAL APPEALS  
5/22/2018  
DEANA WILLIAMSON, CLERK

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<b>SANDRA COY BRIGGS,</b>	§	
<i>Appellant/Respondent,</i>	§	
	§	<b>FROM THE</b>
<b>vs.</b>	§	<b>THIRTEENTH COURT OF</b>
	§	<b>APPEALS</b>
	§	<b>CORPUS CHRISTI, TEXAS</b>
<b>THE STATE OF TEXAS,</b>	§	<b>13-15-00147-CR</b>
<i>Appellee/Petitioner.</i>	§	

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**RESPONDENT'S UNOPPOSED FIRST MOTION FOR  
EXTENSION OF TIME TO FILE BRIEF**

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**TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL  
APPEALS:**

NOW COMES Respondent, SANDRA COY BRIGGS, by and through her undersigned counsel, and files this Unopposed First Motion for Extension of Time to file her Brief. Petitioner respectfully requests a fourteen (14) day extension to June 6, 2018. This is Respondent's first motion for extension of time to file her brief. In support of this motion Respondent would show as follows:

1. Respondent's brief is currently due on May 23, 2018.
2. Counsel has conferred with Enrico Valdez, Bexar County Assistant District Attorney, and he does not oppose this motion.

3. In addition to her regular docket, undersigned counsel was working on a Motion for New Trial in *State v. Robert Corporon*, Llano County, Texas.
4. Undersigned counsel was preparing for oral argument in this Court in *Rhomer v. State*, PD-0448-17, that was held on May 2, 2018.
5. Undersigned counsel is also working on state writs of habeas corpus in *Ex parte Gonzalez* and *Ex parte Lopez*, that were filed on May 16, 2018.
6. This request is not meant for purposes of delay, but so that justice may be done.

### **PRAYER FOR RELIEF**

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that this Honorable Court grant her an additional fourteen (14) days to June 6, 2018 to file her brief and for any other relief under this Court's supervisory power.

Respectfully submitted:

\_\_\_\_/s/Dayna L. Jones\_\_\_\_\_

DAYNA L. JONES

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Attorney for Respondent,  
SANDRA COY BRIGGS

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above foregoing Unopposed Motion for Extension of Time to File Brief has been served *via* e-mail to Enrico Valdez at ricov@bexar.org, Assistant Criminal District Attorney, on this the 21st day of May, 2018.

By:\_\_\_\_/s/*Dayna L. Jones*\_\_\_\_\_  
DAYNA L. JONES

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<b>SANDRA COY BRIGGS,</b> <i>Appellant/Respondent,</i>	§ § § § § § §	<b>FROM THE</b> <b>THIRTEENTH COURT OF</b> <b>APPEALS</b> <b>CORPUS CHRISTI, TEXAS</b> <b>13-15-00147-CR</b>
<b>vs.</b>		
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**RESPONDENT’S UNOPPOSED FIRST MOTION FOR**  
**EXTENSION OF TIME TO FILE BRIEF**

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On this the \_\_\_\_\_ day of \_\_\_\_\_, 2018, came to be heard Respondent’s  
First Motion for Extension of Time to File Brief, and it appears to the court that  
this motion should be:

**GRANTED**

**DENIED**

IT IS THEREFORE ORDERED that the time for filing Petitioner’s Brief in  
this cause be extended to \_\_\_\_\_, 2018.

SIGNED THIS THE \_\_\_\_\_ DAY OF \_\_\_\_\_, 2018.

\_\_\_\_\_  
JUDGE PRESIDING

